IN THE DISTRICT COURT OF THE UNITED STATES FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

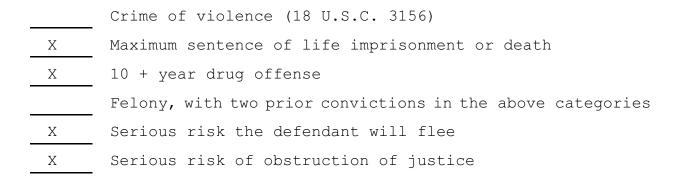
UNITED STATES OF AMERICA)		
)		
V.)	CR. NO.	2:06mj39-SRW
)		
HORACIO JAIMES-ALBITER,)		
CARLOS SOLANO-OLASCOAGA,)		
FRANCISCO ULLOA-JIMINEZ,)		
JULIO CESAR ZAVALA-ULLOA,	and)		
OMAR TORRES-VAZQUEZ)		

GOVERNMENT'S MOTION FOR DETENTION HEARING

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and pursuant to 18 U.S.C. 3142(e) and (f) moves for a detention hearing for the above-captioned defendant.

1. <u>Eligibility of Cases</u>

This case is eligible for a detention order because this case involves:



2. Reason For Detention

The Court should detain defendant because there are no conditions of release which will reasonably assure:

X Defendant's appearance as required
X Safety of any other person and the community

3. Rebuttable Presumption

The United States will invoke the rebuttable presumption against defendant under Section 3142(e). The presumption applies because:

X Probable cause to believe defendant committed 10 + year drug offense or an offense in which a firearm was used or carried under Section 924(c)

Previous conviction for "eligible" offense committed while on pretrial bond

A period of five years has not elapsed from defendant's conviction or release from imprisonment for the offense described above

4. <u>Time For Detention Hearing</u>

The United States requests the Court conduct the detention hearing:

At the initial appearance

X After continuance of 3 days

The Government requests leave of Court to file a supplemental motion with additional grounds or presumption for detention should this be necessary.

Respectfully submitted this the 3rd day of May, 2006.

LEURA G. CANARY United States Attorney

/s/A. Clark Morris
A. CLARK MORRIS
Assistant United States Attorney
One Court Square, Suite 201
Montgomery, AL 36104
Phone: (334)223-7280

Fax: (334) 223-7135

E-mail: clark.morris@usdoj.gov